REPLY TO: LIMETREE BAY, LLC I Estate Hope Christiansted VI 00820-5652



August 26, 2020

Director
Division of Environmental Protection
Department of Planning & Natural Resources
45 Mars Hill
Frederiksted, St. Croix, V.I. 00840-4474

Subject: Title V Permit No. STX-TV-003-10 Six Month Deviation Report

January 1, 2020 through June 30, 2020

Dear Director:

Limetree Bay Terminals, LLC (Limetree Bay Terminals) and Limetree Bay Refining LLC (Limetree Bay Refinery) are submitting this report in accordance with Section 8.13.1 of the above referenced Title V Permit. The permit was issued to HOVENSA, LLC. by VIDPNR on July 1, 2010 and was transferred to Limetree Bay Terminals on March 9, 2016. Limetree Bay Refining elected by letter dated May 29, 2019, to be added as co-permittee to the TV permit pursuant to authority granted in the Refinery Operating Agreement with the Government of the Virgin Islands. This report addresses all deviations from required monitoring as specified by the permit. The deviations and associated information are presented in table format in the enclosed Attachment A.

Additionally, the 6-month compliance schedule progress report is included as Attachment B. The progress report covers those compliance schedules that remain incomplete. However, Limetree Bay Terminals and Refining was in compliance during this semi-annual period with the applicable requirements of the Title V permit referenced in these compliance schedules because of refinery idling. The certification by a responsible official required by Section 8.8.2 is enclosed as Attachment C.

If you have any questions or comments regarding this report, please contact Catherine Elizee at (340) 692-3073.

Sincerely,

Jeffery Hersperger Sr. Vice President

JH/RW/CE/sm/ts Attachments

Cc: Verline Marcellin w/attachments

Sincerely,

Robert Weldzius Sr. Vice President

LIMETREE BAY TERMINALS, LLC LIMETREE BAY REFINERY, LLC

ATTACHMENT C – Certification by Responsible Official of Attachments A and B

Title V Six Month Deviation Report

For the Period January 1, 2020 – June 30, 2020

Based upon information and belief formed after reasonable inquiry, I certify that the statements and information contained in Attachments A and B are true, accurate, and complete.

Hilm	8-25-20
Jeffery Hersperger Sr. Vice President	Date
Robert Wildsig	8/25/20
Robert Weldzius Sr. Vice President	Date

Title V - Attachment A
6-Month Deviation Report: January - June 2020

Description of Deviation	Permit Condition No.	Permit Condition	Plant Area	Process Unit	Source ID (from TV Permit Table 1)	Process (from TV Permit Deviation times and duration Table 1)
None						
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Attachment B

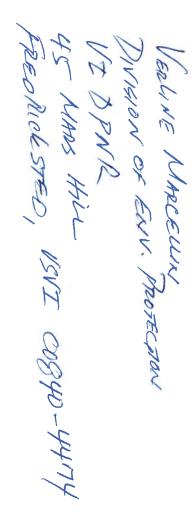
Title V Six Month Compliance Schedule Progress Report Update - Deviation Status Report Out Please note that all refinery specific processing units were idled during the first quarter of 2012.

Progress to Date	Boiler 8 and Boiler 9 LNB installed and CEMS installed. Compliance demonstration scheduled 3rd or early 4th qtr 2020. B5 remains idle.	GTs 1, 2, 3, 5 and 6 are permanently shut down. GT 4 was tested in 2016 and complies with GG limts, GT's 7 and 8 have installed combustion liners sufficient to	Waiting on AMP approval. Affected source now idle.	Penex compressor engines will be restarted and the required monitoring devices will be installed prior to restarting PENEX. 5DD is not included in the current refinery restart.
Status	Open	Closed	Open	Open
Full	7/31/2012	6/7/2016 ⁽¹⁾	Dependent on Dependent on AMP approval	12/3/2013
Construction Completion	7/31/2012	6/7/2016 ⁽¹⁾	Dependent on AMP approval	6/3/2013
Corrective Action	Install equipment necessary to comply with Subpart D requirements	Install CEMS, comply with GG standards	Submit AMP	Penex compressor Add pressure monitoring engines and 5 DD 40 CFR device and thermocouple on catalyst beds
Project	Boilers 5, 8 & 9 Subpart D compliance	GT's 1-9 NO _x , O ₂ CEMS NSPS GG Compliance	NSPS NNN	Penex compressor engines and 5 DD 40 CFR 63 Subpart ZZZZ
TV Schedule	No. 4	No. 6	No. 8	No. 16

 $^{(1)}$ Five years from consent decree date of entry



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